

## **EXHIBIT 4**

CONFIDENTIAL  
TAMRA PAWLOSKI - 01/18/2019

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF MINNESOTA  
3 -----x  
4 FAIR ISAAC CORPORATION, a Delaware  
5 corporation,  
6 Plaintiff,  
7 Case No. 16-cv-1054  
8 v.  
9 FEDERAL INSURANCE COMPANY, an  
10 Indiana corporation, and ACE  
11 AMERICAN INSURANCE COMPANY, a  
12 Pennsylvania corporation,  
13 Defendants.  
14 -----x  
15 8:30 a.m.  
16 January 18, 2019  
17 767 Third Avenue  
18 New York, New York  
19 \* CONFIDENTIAL \*  
20 DEPOSITION of TAMRA PAWLOSKI, a Plaintiff  
21 in the above entitled matter, pursuant to Notice,  
22 before Stephen J. Moore, a Registered Professional  
Reporter, Certified Realtime Reporter and Notary  
Public of the State of New York.  
Job No. MP-204293

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Pages 94..97

<p style="text-align: right;">Page 94</p> <p>1 Son, a division of Federal?</p> <p>2 A Wasn't there a -- is this the</p> <p>3 full amendment number 2?</p> <p>4 Because it's one of an -- I see</p> <p>5 3 of 3, I don't have 2 of 3 in my copy.</p> <p>6 MR. FLEMING: I think the pages</p> <p>7 are mispaginated.</p> <p>8 THE WITNESS: Are they?</p> <p>9 Q They are there, it starts with</p> <p>10 2, 1 and 3.</p> <p>11 A Oh, okay.</p> <p>12 A And then it also says the</p> <p>13 affiliates, right, "Affiliates shall mean any</p> <p>14 entity directly or indirectly controlled by</p> <p>15 client, control means the ownership of more</p> <p>16 than 50 percent."</p> <p>17 That's traditionally in all of</p> <p>18 our contracts, so that's why I couldn't find it</p> <p>19 before.</p> <p>20 Q And the client was Chubb &amp; Son,</p> <p>21 a division of Federal, correct?</p> <p>22 A Yes.</p>	<p style="text-align: right;">Page 96</p> <p>1 license was enterprise-wide with no</p> <p>2 restrictions?</p> <p>3 A He negotiated the deal.</p> <p>4 Q So his information didn't come</p> <p>5 from Chubb's legal department?</p> <p>6 A No.</p> <p>7 Q When you were talking with Mark,</p> <p>8 was your conversation limited to the topic of</p> <p>9 use of the software?</p> <p>10 A It was around the negotiations.</p> <p>11 Q Did you discuss at all the</p> <p>12 issue -- well, let me phrase it again a</p> <p>13 different way.</p> <p>14 Your conversation with Mark was</p> <p>15 about the use of the software, not the physical</p> <p>16 location of the software, correct?</p> <p>17 A Correct.</p> <p>18 Q And did you talk with Mark at</p> <p>19 all in that phone conversation about any</p> <p>20 restrictions about the physical location of</p> <p>21 the --</p> <p>22 MS. KLIEBENSTEIN: I apologize,</p>
<p style="text-align: right;">Page 95</p> <p>1 Q Who were the affiliates of Chubb</p> <p>2 &amp; Son?</p> <p>3 A All of the other entities that</p> <p>4 sat underneath Chubb &amp; Son, a division of</p> <p>5 Federal, I'm not exactly sure what all -- who</p> <p>6 all of them were.</p> <p>7 Q A corporate org chart would tell</p> <p>8 us who the affiliates of Chubb &amp; Sons were?</p> <p>9 A I believe so; yes.</p> <p>10 Q Now, at this time when you</p> <p>11 reviewed this second amendment after the call</p> <p>12 with Mark, did you also go look at the original</p> <p>13 license in conjunction with the amendment?</p> <p>14 A No.</p> <p>15 Q And why not?</p> <p>16 A Because Mark was pretty clear</p> <p>17 that there was an enterprise-wide contract.</p> <p>18 Q What was Mark's position again?</p> <p>19 A He was CIO of our Chubb</p> <p>20 specialty insurance.</p> <p>21 Q Did Mark tell you where he had</p> <p>22 gotten the information that the Blaze Advisor</p>	<p style="text-align: right;">Page 97</p> <p>1 scratch that.</p> <p>2 Q In your conversation with Mark,</p> <p>3 did you talk at all about the installation and</p> <p>4 physical location of Blaze Advisor as opposed</p> <p>5 to the use?</p> <p>6 A No, it was just -- it was an</p> <p>7 enterprise-wide license.</p> <p>8 Q Did you have any role in the</p> <p>9 process of merging ACE and Chubb?</p> <p>10 MR. FLEMING: You are talking</p> <p>11 about negotiating that transaction?</p> <p>12 A Yeah, I'm sorry, I don't know</p> <p>13 what you're asking.</p> <p>14 Q Well, I can skip to the more --</p> <p>15 what I'm looking for is just a general</p> <p>16 understanding of your role in the process of</p> <p>17 merging ACE and Chubb.</p> <p>18 That can be negotiation of a</p> <p>19 part, something else, you tell me?</p> <p>20 MR. FLEMING: You are beginning a</p> <p>21 few topic, after these questions can we</p> <p>22 take a five minute break?</p>